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Evarts, Sara

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From: Bosworth, Martha <bosworth.martha@epa.gov>
Sent: Thursday, November 07, 2013 10:45 AM
To: Hornok, Gerald
Subject: Jard cover letter and list of questions for CSC
Attachments: Document.pdf



SDMS DocID 584914

Follow Up Flag: Follow up
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Gerry,

Here is the cover letter and list I sent to CSC regarding JARD. I also got a message from Tanya regarding this list. They are reviewing and will get back to us either today or tomorrow with comments.

Martha



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912**

October 29, 2013

Tanya M. Amine, Environmental Scientist
Computer Sciences Corporation
6361 Walker Lane, Suite 300
Alexandria VA 22310

Re: Jard Company, Inc. HRS package references

Dear Tanya:

Please find enclosed a compact disc containing the cited references for the Jard Company, Inc. HRS documentation record. In addition, attached to this letter is a bullet list of HRS documentation record points and issues. The region has tried to point out the areas that we recognize may pose questions or require additional technical direction.

I look forward to receiving your comments on this submittal.

Regards,

A handwritten signature in cursive script, reading "Martha Bosworth", is positioned above the typed name.

Martha Bosworth,
SAM Region 1

Cc: Terry Jeng, OSRTI

HRS DOCUMENTATION RECORD POINTS/ISSUES

Below is a bulleted list of either issues noted during production of the Jard Company, Inc. (Jard) HRS Documentation record or questions to be resolved in the forthcoming months prior to listing. This summary document is organized by section within the HRS Documentation Record.

Figures

- The region would appreciate feedback regarding the shape of the site as it has been drawn based on site sources, the ground water release, and documented contamination within the overburden aquifer and the surface water pathway.

References

- The region acknowledges that some of the Memorandum or Project Note references lack initials or signatures. We tried, but were unable to obtain this documentation from some note authors due to personnel changes, etc. What, if anything, more should we do?

Site Summary

- Previous discussions concerning polychlorinated biphenyls (PCBs) with Headquarters (HQ) personnel and/or contractors have concluded that congener analysis is helpful in some cases. This analysis was performed on a limited number of samples for each matrix (source, ground water, and sediment). This information was presented in passing in the site summary with the data validation memorandum as the reference. Is any other summary suggested when referencing this data or to be included along with the validation memo?

Source Characterization

- Source Number 1 was characterized as a contaminated soil source and therefore compared against background soil samples. Reference 78 presents a detailed comparison of background and soil/source samples. This comparison indicates that a few of the 10 background samples presented could be excluded. The region chose to present all of the background samples in this initial submittal in order to cover the range of natural matrix descriptions and to avoid bias in choosing which samples should be excluded. But we realize that 10 background samples is excessive. How would HQ suggest dealing with the large number of background samples presented? In addition, we would like to discuss sample similarity with respect to sample depth on source areas that have undergone a removal action or capping, as with portions of Source No. 1?

Ground Water Migration Pathway

- The region acknowledges that private names were used in portions of this section. This is based on the state's/contractor's use of the names to identify residential drinking water samples (i.e. the "Watson" sample) in the source documents cited. The region has only presented the names in reference to the actual samples collected and has used generic property designations in place of addresses whenever possible. The repeated use of private names by others is also seen in reference to the "Greene Pond". How would you suggest the region deal with the use of private names in cited source documents?
- The background drinking water sample was collected from a private well directly adjacent to the target well being scored. This background well provided the most similar sample based on collection date, method, analysis, well type/usage, etc., but is also in an area mapped as part of the PCB-contaminated ground water plume, and is located downgradient of site sources. Does this present any issues? Is the background sample presented a strong enough sample or should the

region try to look at possible alternatives such as ground water sample(s) collected from monitoring wells instead?

- The observed release presented in the Ground Water pathway is limited to Aroclor 1016, while only Aroclor 1242 has been identified in the recent Source samples. The region recognizes that only PCBs in general are listed in SCDM. Furthermore, the documentation record presents information regarding the documented use of both Aroclors 1242 and 1016 by the facility, and also presents some general information about the impacts of weathering and analytical interpretation on Aroclor identification. Is there additional or different information that the region should be presenting to bolster the case that Aroclor 1016 is attributable to the site?

Surface Water Migration Pathway – Ground Water to Surface Water Component

- The ground water to surface water component template indicates that the elevation of the bottom of the surface water body should be presented. Data collected previously at the site has indicated the surface elevation of the surface water. This is presented within the component description. In your opinion, will the data presented suffice or should additional data be collected (i.e. survey measurement data)? Please note that if additional data will be required, its collection will have to take place soon due to weather considerations, so we would appreciate your prompt review of this issue.
- The ground water to surface water component template indicates that the theta angle be calculated. Based on the Rule, it appears this information is only used in scoring the Drinking Water Threat. The region did not score the Drinking Water Threat and therefore excluded the calculation of the theta angle. Is this a correct assumption?
- The region has presented a Level II Concentrations table to indicate which samples are to be used in scoring the Level II Wetland frontage. A closer examination of all of the Target sections within the Pathway templates does not show a place for the Level II Concentrations. In your opinion, should these be presented in a table or referenced to earlier release tables acknowledging that either a comparison value does not exist or the sample concentration is below the applicable comparison standard?